

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

Kevin Y. Teruya (Bar No. 235916)  
kevinteruya@quinnemanuel.com  
865 South Figueroa Street, 10<sup>th</sup> Floor  
Los Angeles, CA 90017  
(213) 443-3000

*Attorneys for Plaintiffs Maximilian Klein,  
Rachel Banks Kupcho, and Sarah Grabert*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

This Document Relates To: All Actions

Consolidated Case No. 3:20-cv-08570-JD

**DECLARATION OF CLAIRE D.  
HAUSMAN IN SUPPORT OF CONSUMER  
PLAINTIFFS' OPPOSITION TO  
DEFENDANT FACEBOOK'S MOTION  
TO EXCLUDE TESTIMONY AND  
OPINIONS OF JOSEPH FARRELL,  
D.PHIL**

The Hon. James Donato

I, Claire D. Hausman, declare:

1. I am of counsel at Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”). I have been actively involved in this action, am familiar with the proceedings, and have personal knowledge of the matters stated herein.

2. I respectfully submit this declaration in support of Consumer Plaintiffs’ Opposition to Defendant Facebook’s Motion to Exclude Testimony and Opinions of Joseph Farrell, D.Phil. Attached to this declaration are true and correct copies of **Exs. 1-11**, which are documents and deposition transcripts that Consumer Plaintiffs cite in their Motion. For the Court’s convenience, the relevant portions of the documents and deposition transcripts have been excerpted where applicable.<sup>1</sup>

<u>Ex. No.</u>	<u>Description of Exhibit</u>	<u>Provisionally Filed Under Seal</u>
1	Merits Expert Report of Consumer Expert Joseph Farrell, D.Phil.	Yes
2	Excerpts from Merits Expert Rebuttal Report of Consumer Expert Joseph Farrell, D. Phil.	Yes
3	Excerpts from Merits Expert Report of Facebook Expert John A. List, Ph.D.	Yes
4	Excerpts from Deposition of Dr. John List, taken in <i>Klein v. Meta Platforms</i> on March 1, 2024	Yes
5	Excerpts from Deposition of Joseph Farrell, D.Phil., taken in <i>Klein v. Meta Platforms</i> on March 15, 2024	Yes
6	Excerpts from Deposition of Facebook, Inc through corporate designee Lars Backstrom, taken in <i>Klein v. Meta Platforms</i> on July 27, 2023	Yes
7	PALM-003556066	Yes
8	PALM-900000154 (Exhibit 2968)	No
9	CONSUMER-FB-0000002291	No
10	Excerpts from 2023 Merger Guidelines from the U.S. Department of Justice and the Federal Trade Commission	No

<sup>1</sup> Should the Court find it helpful, Consumers can submit any cited materials in full.

<u>Ex. No.</u>	<u>Description of Exhibit</u>	<u>Provisionally Filed Under Seal</u>
11	Daniel P. O'Brien & Abraham L. Wickelgren, <i>A Critical Analysis of Critical Loss Analysis</i> , 71 Antitrust L.J. 161, 161 (2003)	No

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 12th day of May, 2025 in Los Angeles, California.

By /s/ Claire D. Hausman

Claire D. Hausman

**ATTESTATION**

I, Kevin Y. Teruya, am the ECF user whose ID and password are being used to file the above document. In compliance with Local Rule 5-1(i)(3), I hereby attest that Claire D. Hausman has concurred in the filing of the above document.

By /s/ Kevin Y. Teruya

Kevin Y. Teruya